Amendments to the Drawings:

Replacement Sheets for correction of Figures 1a-c, 2 and 3 are submitted herewith.

REMARKS/ARGUMENTS

Drawing Amendments

Applicant submits replacement sheets for corrected drawings Figures 1a-c, 2 and 3 whereby each said Figure is identified as "PRIOR ART", as required by the Examiner.

Claim Amendments

Independent claims 1 and 8 have been amended whereby these claims now require that: i) the <u>association of the documents with the concept identifiers presented on the electronic display be updated on the basis of the learned dynamic information pertaining to the user</u>; and, ii) those associated documents are all documents input over a period time which have been "<u>stored up to date in storage means</u>". No new matter has been added by these amendments.

Claim Objections and Claim Rejections under 35 U.S.C. §112

Under paragraph 3 of said Office Action the Examiner objects to claim 1 as allegedly including step (b) twice and allegedly ending step (e) with "includes said learned dynamic information of; and,". However, neither said occurrence is believed to be in claim 1, as alleged, and it is unclear to Applicant's undersigned attorney what claim set the Examiner is referring to in making these statements. A review of the present claims of record, as shown in the USPTO PAIR database (which is in conformity with attorney's file), reveals that neither such occurrence is present. However, if the Examiner continues to find such occurrences in the claims it is requested that she telephone the writer (at 613-238-6404) to review and clarify the same.

Applicant respectfully requests reconsideration and withdrawal of the claim rejections by the Examiner having regard to the following submissions.

35 U.S.C. §102 Rejection

The Examiner rejected all claims, except dependent claims 6 and 13, on the

basis of alleged anticipation by the cited reference Millier (U.S. patent No. 5,899,995). Withdraw of this rejection is respectfully requested in view of the present claim amendments and the following submissions.

As indicated above, the independent claims have been amended to recite that the association of the input documents, up to date, with the concept identifiers presented on the electronic display by the viewer component, is updated on the basis of the learned dynamic information pertaining to the user. The cited reference Millier does not in any manner disclose such a dynamic document viewer presentation by which the association (i.e. classification) of documents with concept identifiers (for presentation), being all documents input to the system to date and not just future input documents per Millier, is updated on the basis of changing, automatically learned user preferences.

In the case of Millier, learned Information affects only how the filing of documents into folders will take place thereafter, i.e. on a going forward basis, but does not alter or affect the filing of previously filed documents which will remain in the originally designated folders regardless of any user action or preferences subsequently learned. In Millier's system, no re-categorization of a document is possible or contemplated and no suggestion is made that the data in folders will be re-organized based on new knowledge that has been learned. As stated previously, Millier has no concern with, or any discussion whatsoever regarding, the presentation of prioritized concept identifiers. Instead, Millier is directed to a method and means for automatically filing information, for all time, into a number of pre-profiled categories (folders) – see Fig. 2A.

By contrast, Applicant's system and method provide for a dynamic personalized presentation of documents as those documents are input over time and user preferences change over time. Concept recognition operates on a store of documents, input to date, in combination with concept learning that dynamically learns of changing user preferences and environment and associates those documents with those learned concepts on an on-going basis. As stated under, *inter alia*, paragraph

70 of the present application, as published (corresponding to lines 22-27 of page 21 of the application as filed): "The background functions executed by the concept learner component 130, and the concept recognizer 140 and prioritization relevance analyser 150, continue to learn new knowledge (e.g. reinforcement of concepts and/or user activity) and they may operate to update the current browser view displayed for the user as new information about concepts is accumulated (that is, if relevant to the current concept view screen being shown to the user)."

It is noted, in the Examiner's response to the previously filed arguments, that a statement is made which is believed to incorrect and unwarranted in view of the claims and subject matter of this application. Specifically, the Examiner alleges that Applicant relies on "prioritization" not recited in the rejected claims. In fact, the feature of prioritization *is*, in effect, recited and claimed because the claims require dynamic ordering of recognized concepts etc. according to user preferences information-based priorities. It is submitted that this "ordering" is the same as, and in effect *is*, a prioritization.

The cited Millier reference does not teach every aspect of the amended claims and, accordingly, Applicant requests withdrawal of this objection and allowance of these claims.

35 U.S.C. §103 Rejection

The Examiner has rejected the dependent claim 6 and 13 under 35 U.S.C. 103(a) as allegedly being unpatentable over Millier and further in view of Hyatt (U.S. patent No. 6,678,692). In view of the foregoing and the present claim amendments, Applicant traverses such allegation and requests that the same be withdrawn.

Like Millier, and for the same reasons provide above, the cited reference to Hyatt does not disclose the features of the amended independent claims. Nor does it teach those features or in any manner suggest them if viewed in combination with Millier. Since each of claims 6 and 13 is a dependent claim, and since it is submitted that the independent claims they refer to define new and inventive subject matter over

both of Millier and Hyatt, it follows that each of said dependent claims is also new and inventive. Applicant submits, therefore, that these claims are also in form for allowance.

CONCLUSIONS

For all the foregoing reasons, applicant respectfully submits that the amended claims submitted herewith are in good form for allowance and the same is requested. In the event that the Examiner cannot allow the present application for any reason, the Examiner is encouraged to contact Applicant's attorney to discuss resolution of any remaining issue.

Respectfully Submitted,
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